

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.,	)	CASE NO. 1:08-CV-2755
	)	
Plaintiff,	)	JUDGE LESLEY WELLS
	)	
v.	)	<b>MOTION FOR LEAVE TO EXCEED PAGE</b>
	)	<b>LIMITATIONS IN OPPOSITION TO THE</b>
SAP AMERICA, INC., et al.	)	<b>SAP DEFENDANTS' "MOTION TO</b>
	)	<b>PRECLUDE INADMISSIBLE LAY</b>
Defendants.	)	<b>OPINION TESTIMONY"</b>

Plaintiff Hodell-Natco Industries, Inc. ("Hodell"), through undersigned counsel, respectfully requests an extension of the page limitations provided by Local Rule 7.1 in opposing the SAP Defendants' "Motion to Preclude Inadmissible Lay Opinion Testimony" filed April 14, 2015. [ECF #304]. Hodell requests leave to file a Memorandum in Opposition not to exceed 35 pages in length.

To be clear, Hodell believes that the issues raised in SAP's Motion have already been briefed and decided with finality in Hodell's favor through the Court's Order dated January 28, 2014 and that additional motion practice is unwarranted. However, SAP has filed a thirty-five (35) page "motion *in limine*" (counting the Table of Contents and Table of Authorities) accompanied by twenty-two (22) footnotes, one appendix and twelve (12) exhibits well in excess of the page limitations for non-dispositive motions. In the event SAP is granted leave to file such an expansive brief, Hodell should be given equivalent leave to respond.<sup>1</sup> The issues addressed in SAP's Motion are obviously of great importance to a central issue in this case, and

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<sup>1</sup> SAP's motion to exceed the page limitations for its brief [ECF #303] remains pending.

Hodell should be afforded a fair opportunity to oppose SAP's Motion.

Accordingly, Hodell requests an extension of the Local Rule 7.1 page limitations for non-dispositive motions and requests leave to file a Memorandum in Opposition to the SAP Defendants' "Motion to Preclude Inadmissible Lay Opinion Testimony" not to exceed 35 pages.

Dated: May 1, 2015

Respectfully submitted,

/s/ P. Wesley Lambert  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on May 1, 2015, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the document through the Court's electronic filing system.

/s/ P. Wesley Lambert  
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*Attorney for Plaintiff Hodell-Natco  
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